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Plaintiff's request to file a consolidated 40 page opposition brief to the two motions to dismiss is Granted. In accordance with Judge Garrity's Order in the related bankruptcy proceeding,19-13895-JLG, this case is stayed until May 22, 2020. Defendants' time to file reply briefs will be extended accordingly.

May 6, 2020

VIA ECF

Hon. Vernon S. Broderick United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 New York, NY 10007

HON VERNON S. BRODERICK 5/8/20

SO ORDERED:

UNITED STATES DISTRICT JUDGE

Re: Recovery Effort Inc. v. Zeichner Ellman & Krause LLP, et al., No. 19-cv-05641 (VSB)

Dear Judge Broderick:

We represent plaintiff in the above-captioned action and write, on behalf of the Chapter 7 Trustee in the Orly Genger bankruptcy proceeding (No. 19-13895-JLG), to request a brief stay of all deadlines in this action through May 25, 2020. The parties to this action do not oppose this stay.

Yesterday afternoon, the Bankruptcy Court held a status conference in the Orly Genger bankruptcy case. During that conference, Judge James L. Garrity set another status conference on May 22, 2020 and directed that all litigation is to be held in abeyance until the adjourned May 22 conference.

While the issue was not clearly addressed during the conference, it is the Bankruptcy Trustee's view that Judge Garrity was referring to litigation in *all related cases* and that all deadlines in this case (and other related cases) should be stayed through the upcoming May 22 conference.

Although we are prepared to file our opposition to defendants' motions to dismiss tomorrow, <u>Thursday, May 7, 2020</u>, and although we do not believe that any stay is warranted, we have no objection to the Trustee's request that all deadlines should be stayed until after the May 22, 2020 date of the next bankruptcy court status conference. Defendants request that the deadline for submission of their reply briefs be adjourned to four weeks later, <u>June 22, 2020</u>.

Thank you for Your Honor's consideration in this matter.

Respectfully submitted,

/s/ Adam Pollock

Adam Pollock

cc: Rocco Cavaliere, Esq. (via email) (Counsel to the Bankruptcy Trustee)